

Document Page 1 of 1
**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

SHAWN C MCGUIRE

Chapter 13

Debtor

Bankruptcy No. 17-14056-AMC

**OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTOR(S)**

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to notify his/her personal injury attorney of the bankruptcy and/or include appropriate language in the Plan regarding the proceeds of such litigation.

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim. The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller
William C. Miller, Esquire
Chapter 13 Standing Trustee